

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

**FILED**

APR 20 2021

U.S. CLERK'S OFFICE  
INDIANAPOLIS, INDIANA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYRONE ROSS,

Defendant.

CAUSE NO:

**1 : 21 - cr - 0130 JMS - MJD**

**INDICTMENT**

The Grand Jury charges that:

COUNT 1

18 U.S.C. § 922(g)(1)  
Felon in Possession of a Firearm

On or about May 30, 2020, within the Southern District of Indiana, TYRONE ROSS, the defendant herein, after knowingly having been convicted of one or more felony crimes punishable by imprisonment for a term exceeding one (1) year, to wit:

Armed Robbery, a Class B Felony in Marion County, Indiana, on or about February 11, 2011, under cause number 49G03-1011-FB-083944; and/or Invasion of Privacy, a Level 6 Felony in Marion County, Indiana, on or about November 20, 2018, under cause number 49G04-1806-F3-019557; and/or Resisting Law Enforcement, a Level 6 Felony in Marion County, Indiana, on or about July 3, 2019 under cause number 49G04-1904-F6-015215,

did knowingly possess in and affecting commerce a firearm, to wit: a Hi-Point .380 caliber handgun model CF380, in violation of Title 18, United States Code, Section 922(g)(1).

## **FORFEITURE**

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby gives the defendant notice that the United States will seek forfeiture of property, criminally and/or civilly, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), as part of any sentence imposed.

2. Pursuant to Title 18, United States Code, Section 924(d), if convicted of the offenses set forth in Count One of this Indictment, the defendant shall forfeit to the United States “any firearm or ammunition involved in” the offenses.

3. The property subject to forfeiture includes, but is not necessarily limited to, the following:

- a. a Hi-Point .380 caliber handgun model CF380, serial number P8171381;
- b. all recovered .380 caliber ammunition.

4. The United States shall be entitled to forfeiture of substitute property pursuant to, and as incorporated by Title 28, United States Code, Section 2461(c), if any of the property described above in paragraph 4, as a result of any act or omission of the defendant:

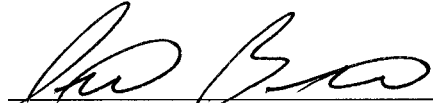
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;

A TRUE BILL:

FOR PERSON

JOHN E. CHILDRESS  
Acting United States Attorney

By:

  
\_\_\_\_\_  
Peter A. Blackett  
Assistant United States Attorney